

October 10, 2003

2500 Brown & Williamson Tower

Louisville, Kentucky 40202

502.584.1135

502.561.0442 fax

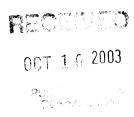
www.middreut.com

Douglas F. Brent

Direct dial: 502-625-2771

dbrent@middreut.com

Mr. Thomas M. Dorman Kentucky Public Service Commission 211 Sower Boulevard P.O. Box 615 Frankfort, Kentucky 40601



RE: Case No. 2003-00379

Dear Mr. Dorman:

Enclosed please find the original and ten copies of MCI WorldCom Communications, Inc. ("MCI") Initial Data Requests to BellSouth Telecommunications, Inc. ("BST"). Please indicate receipt of this filing by your office by placing a file stamp on the extra copy and returning to me via the enclosed, self-addressed, stamped envelope.

Sincerely Yours,

Douglas F. Brent

Counsel to

MCI WorldCom Communications, Inc.

DFB:jms

Enc.

Cc: Parties of Record

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

| ~ | 0 | -0.5 | 0 | 20 | 0. |
|---|---|------|-----|------|------|
| | | | 7 . | 111 | 11 - |
| | | | | 7 11 | 11. |
| | | | | | |

| In | the | M | atter | of: |
|----|------|-----|-------|-----|
| | 1115 | IVI | ансь | |

| REVIEW OF FEDERAL COMMUNICATIONS |) |
|-------------------------------------|-----------------------|
| COMMISSION'S TRIENNIAL REVIEW ORDER |) CASE NO. 2003-00379 |
| REGARDING UNBUNDLING REQUIREMENTS |) |
| FOR INDIVIDUAL NETWORK ELEMENTS |) |

INITIAL DATA REQUESTS

MCI WorldCom Communications, Inc. ("MCI"), pursuant to the Kentucky Public Service Commission's Order in this docket issued on October 2, 2003, hereby serves its Initial Data Requests to BellSouth Telecommunications, Inc. ("BellSouth").

- 1. Please state whether you have any affiliates that are serving mass market customers in Kentucky with the use of their own local circuit switches, or are offering wholesale local circuit switching service to customers serving DS0 capacity loops in Kentucky using their own switches. If your response is affirmative, please identify each such affiliate. For purposes of these Requests, "affiliate" shall be as defined in the Communications Act of 1934. Section 3 of the Act defines the term "affiliate" as "a person that (directly or indirectly) owns or controls, is owned or controlled by, or is under common ownership or control with, another person. For the purposes of this paragraph, the term 'own' means to own an equity interest (or the equivalent thereof) of more than 10 percent." 47 U.S.C. § 153(1). For the purpose of this request the term "identify" means to state the full name, address and telephone number of the entity and any names under which it conducts business
- 2. For each switch you use to provide local service to Kentucky customers, please provide the following information for the switch and/or the switch location:
 - (a) common language location identifier ("CLLI") code;
 - (b) V&H coordinates;
 - (c) street address;
 - (d) switch manufacturer and model:
 - (e) currently loaded version of switch software;
 - (f) current equipped line side capacity in DS-0/voice grade equivalents;
 - (g) current utilized line side capacity in DS-0/voice grade equivalents;
 - (h) current switch processor capacity in CCS;
 - (i) busy hour and busy season utilized switch processor capacity in CCS.

3. For each switch identified in response to Request 2 above, please provide the following information:

| Switch CLLI Code | Number Of Loops Per Customer Premises | Total Number of Local Service Customers | Type of Customer | Number of Voice Only Customers | Number of DSL Only Customers | Number of Voice Plus DSL Customers | Number of Fax or Modem Customers |
|------------------------|--|--|---------------------|--------------------------------------|------------------------------------|---|---|
| ABC | 1 | e.g. 10,155 | Residential | e.g. 10,000 | e.g. 5 | e.g. 100 | e.g. 50 |
| | 1 | e.g. 5,300 | Business | e.g. 5,000 | e.g. 100 | e.g. 100 | e.g. 100 |
| | 2 | | Residential | | | | |
| | 2 | | Business | | | | |
| | 3 | | Residential | | | | |
| | 3 | | Business | | | | |
| | (continue pattern as above) | | | | | | |
| | 18 | | Residential | | | | |
| | 18 | | Business | | | | |
| | 19-24 | | Residential | | | | |
| | 19-24 | | Business | | | | |
| | one DS-1 | | Residential | | | | |
| | one DS-1 | | Business | | | | |
| | more than | | Business | | | | |
| | one DS-1 | | | | | | |

- 4. For each switch identified in your response to Request 2 that is not physically located in Kentucky, please state whether such switch also provides service to customers in the state in which the switch is located. If the answer is affirmative, please describe the manner in which the switch's capacity is divided or allocated between the two states.
- 5. For each switch identified in your response to Request 2, please state whether you own the switch, or instead whether you have leased the switching capacity or otherwise obtained the right to use the switch on some non-ownership basis. If you do not own the switch,
 - (a) state whether the entity owning the switch is an affiliate of yours;
 - (b) identify the entity owning the switch and (if different) the entity with which you entered into an arrangement to obtain switching capacity;
 - (c) identify the nature of the arrangement through which you obtained switching capacity;
 - (d) provide a copy of the agreement through which you obtained switching capacity.
- 6. For each switch you own or control and from which you offer or provide UNE-P to carriers that are not affiliated with you, to use to serve Kentucky customers,

please provide the following information for the switch and/or the switch location:

- (a) common language location identifier ("CLLI") code;
- (b) V&H coordinates;
- (c) street address;
- (d) switch manufacturer and model;
- (e) current loaded version of switch software;
- (f) current configured line side capacity in DS-0 equivalents;
- (g) current utilized line side capacity in DS-0 equivalents;
- (h) current processor capacity in CCS;
- (i) busy hour and busy season utilized processor capacity in CCS.
- 7. For each switch identified in response to Request 6 above, please provide the following information:

| Switch CLLI | Number Of Loops Per | Total Number of | Type of Customer | Number of Voice Only | Number of DSL Only | Number of Voice Plus | Number of Fax or | |
|----------------|-----------------------------|--------------------|---------------------|-------------------------|--------------------|-------------------------|---------------------|--|
| Code | Customer | Local Service | | Customers | Customers | DSL | Modem | |
| | Premises | Customers | | | | Customers | Customers | |
| ABC | 1 | e.g. 10,155 | Residential | e.g. 10,000 | e.g. 5 | e.g. 100 | e.g. 50 | |
| | 1 | e.g. 5,300 | Business | e.g. 5,000 | e.g. 100 | e.g. 100 | e.g. 100 | |
| | 2 | | Residential | | | | | |
| | 2 | | Business | | | | | |
| | 3 | | Residential | | | | | |
| | 3 | | Business | | | | | |
| | (continue pattern as above) | | | | | | | |
| | 18 | | Residential | | | | | |
| | 18 | | Business | | | | | |
| | 19-24 | | Residential | | | | | |
| | 19-24 | | Business | | | | | |
| | one DS-1 | | Residential | | | | | |
| | one DS-1 | | Business | | | | | |
| | more than | | Business | | | | | |
| | one DS-1 | | | | | | | |

- 8. For each CLEC and other carrier collocation arrangement in each BellSouth central office or wire center in Kentucky, please provide the following information, reported by CLLI code and street address:
 - (a) name of CLEC or other carrier;
 - (b) type of collocation arrangement (e.g. caged, cageless, virtual, etc.);
 - (c) size of collocation arrangement;
 - (d) amount of power (including both "A" and "B" DC feeds and AC power) supplied to the collocation arrangement;

- (e) number of 2-wire cross connects currently provisioned from the MDF to the collocation arrangement;
- (f) number of 4-wire cross connects currently provisioned from the MDF to the collocation arrangement;
- (g) all equipment installed in the collocation arrangement, including make, model, and total installed capacity for each piece of equipment;
- (h) type(s) of BellSouth transport connected to the collocation arrangement (e.g., special access, UNE transport, etc.);
- (i) capacity(ies) of BellSouth transport connected to the collocation arrangement (e.g., DS-1, DS-3, OC-3, etc., and number of circuits at each level of capacity);
- (j) all non-recurring and recurring charges for the collocation arrangement;
- (k) name(s) of other collocating carrier(s) to which this collocation arrangement is connected in this central office or wire center.
- 9. For each BellSouth central office or wire center in Kentucky, please identify the amount of available unused collocation space, in terms of total square feet of space and type(s) of collocation for which available space can be used. Please identify each central office in which collocation space has been exhausted, or for which collocation space exhaustion is anticipated in the next 3 years, including the date of exhaust or expected exhaust.
- 10. For each BellSouth central office or wire center at which loops and transport are connected at collocation arrangements to form EELs, please provide the following information:
 - (a) the CLLI code, street address, and V&H coordinates of the BellSouth central office or wire center where such EELs are created;
 - (b) the CLLI code, street address, V&H coordinates, and owner(s) of the switch(es) to which such EELs are connected;
 - (c) number of such EELs that comprise DS-0/voice grade transport connected to DS-0/voice grade loops;
 - (d) number of such EELs that comprise DS-1 transport connected to multiplexed DS-0/voice grade loops;
 - (e) number of such EELs that comprise DS-1 transport connected to multiplexed and concentrated DS-0/voice grade loops, and the loop-to-transport concentration ratio;
 - (f) number of such EELs that comprise DS-3 transport connected to multiplexed DS-0/voice grade loops:
 - (g) number of such EELs that comprise DS-3 transport connected to multiplexed and concentrated DS-0/voice grade loops, and the loop-to-transport concentration ratio;
 - (h) number of such EELs that comprise DS-1 transport connected to DS-1 loops;
 - (i) number of such EELs that comprise DS-3 transport connected to multiplexed DS-1 loops;

- (j) number of such EELs that comprise DS-3 transport connected to multiplexed and concentrated DS-1 loops, and the loop-to-transport concentration ratio.
- 11. For each BellSouth central office or wire center at which loops and transport are connected to form EELs *without* using collocation, please provide the following information:
 - (a) the CLLI code, street address, and V&H coordinates of the BellSouth central office or wire center where such EELs are created;
 - (b) the CLLI code, street address, V&H coordinates, and owner(s) of the switch(es) to which such EELs are connected;
 - (c) number of such EELs that comprise DS-0/voice grade transport connected to DS-0/voice grade loops;
 - (d) number of such EELs that comprise DS-1 transport connected to multiplexed DS-0/voice grade loops;
 - (e) number of such EELs that comprise DS-1 transport connected to multiplexed and concentrated DS-0/voice grade loops, and the loop-to-transport concentration ratio;
 - (f) number of such EELs that comprise DS-3 transport connected to multiplexed DS-0/voice grade loops;
 - (g) number of such EELs that comprise DS-3 transport connected to multiplexed and concentrated DS-0/voice grade loops, and the loop-to-transport concentration ratio;
 - (h) number of such EELs that comprise DS-1 transport connected to DS-1 loops;
 - (i) number of such EELs that comprise DS-3 transport connected to multiplexed DS-1 loops;
 - (j) number of such EELs that comprise DS-3 transport connected to multiplexed and concentrated DS-1 loops, and the loop-to-transport concentration ratio.

Respectfully submitted,

C. Kent Hatfield

Douglas F. Brent

MIDDLETON REUTLINGER

2500 Brown & Williamson Tower

Louisville, Kentucky 40202

(502) 584-1135

COUNSEL FOR MCI WORLDCOM COMMUNICATIONS, INC.

CERTIFICATE OF SERVICE

This is to certify that I have this 10th day of October, 2003 caused to be served by United States mail a copy of the within and foregoing Initial Data Requests upon the following persons, properly addressed as follows:

Douglas F. Brent

Stephen R. Byars Vice President – External Affairs ALLTEL Communications, Inc P.O. Box 1650 Lexington, Kentucky 40588-1650

Joan Coleman
Vice President
Regulatory & External Affairs
BellSouth Telecommunications, Inc.
601 West Chestnut Street, Room 410
P.O. Box 32410
Louisville, Kentucky 40232

Hon. Ann Louise Cheverout Office of the Attorney General Utility & Rate Intervention Division 1024 Capital Center Drive Suite 200 Frankfort, Kentucky 40601-8204

Jouett Kinney Cincinnati Bell 201 East 4th Street Building 103-1610 Cincinnati, Ohio 45201